Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

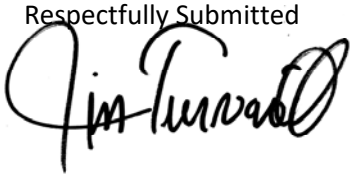
COMMENT:

TTS requests review of language in 73.316(a) to specify that FM stations can utilize both horizontal-only or vertical-only polarization. The language in this section has been interpreted by FCC staff that vertical-only polarization is not permitted, except for circumstances previously permitted to NCE facilities in the proximity of Television Channel 6 stations.

The use of horizontal polarization is a hold-over from the last century when FM signals were new and attempted to serve vast regions of area like early Television stations which were also horizontally polarized. That time has come and gone, and FM stations now are plentiful on the dial in nearly every location, making licensees program to, and serve, a much smaller geographic areas. With the use of at-home FM receivers on the decline and exponentially greater percentages of FM listeners being in a mobile environment, the use of vertical polarity for broadcasting most accurately meets the receiver profiles. Vertically polarized FM transmitting antennas are more financially affordable, more technically efficient utilizing lower Transmitter Power Output levels, and exert measurably less downward radiation in the proximity of the tower site as an improvement in RF safety.

A thorough review of this technical restriction is hereby encouraged.

Respectfully Submitted



Jim Turvaville, Owner
Turbo Technical Services